

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF JOINT SUBMISSION IN  
RESPONSE TO DKT. 242, 242-1 RE:  
CUSTODIANS AND SEARCH TERMS**

Referral: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is Google's Motion to Seal Joint Submission in Response to Dkt. 242, 242-1 Re: Custodians and Search Terms ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

<b>Document Sought to Be Sealed</b>	<b>Court's Ruling on Motion to Seal</b>	<b>Basis for Sealing Portion of Document</b>
Joint Submission	GRANTED as to redacted portions at pages 3, 4	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to internal cookies, identifiers, and projects and their proprietary functions, as well as Google's internal communications and practices with regard to Incognito, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

**SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. SUSAN VAN KEULEN  
United States Magistrate Judge